DOC NO REC'D/FILED

2016 SEP 12 AM II: 56 THE UNITED STATES DISTRICT COURT PETER OPPENEER THE WESTERN DISTRICT OF WISCONSIN

WD OF WI

LOC BUI,

UNITED STATES OF AMERICA

INFORMATION

v.

Case No. 16-cr-00009-wmc

21 U.S.C. § 846 21 U.S.C. § 841(a)(1)

18 U.S.C. § 1956(a)(1)(B)(i)

Defendant.

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

1. From on or about December 12, 2012, through on or about February 10, 2015, in the Western District of Wisconsin and elsewhere, the defendant,

LOC BUI,

conspired with Kyle D. Lux, Stevenson Tran, Peter Nguyen, Quan Tran, and Thay Kha Danh, and with others, known and unknown to the grand jury, to knowingly and intentionally possess with the intent to distribute and to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

- 2. It was part of this conspiracy that LOC BUI, Kyle D. Lux, Stevenson Tran, Peter Nguyen, Quan Tran, and Thay Kha Danh, obtained marijuana from the State of Oregon and transported the marijuana to the Western District of Wisconsin and elsewhere for distribution.
 - 3. It was further part of this conspiracy that LOC BUI, Peter Nguyen, Kyle

D. Lux, and others, unknown to the grand jury, shipped parcels containing marijuana from the State of Oregon to the Western District of Wisconsin and elsewhere.

- 4. It was further part of this conspiracy that LOC BUI, Peter Nguyen, Thay Kha Danh, Kyle D. Lux, and Stevenson Tran, and others, known and unknown to the grand jury, received and arranged the receipt of marijuana in the Western District of Wisconsin and elsewhere for delivery to local marijuana sub-distributors.
- 5. It was further part of this conspiracy that LOC BUI, Peter Nguyen, and Kyle D. Lux, and others, known and unknown to the grand jury, opened bank accounts at financial institutions, namely, Wells Fargo Bank, U.S. Bank, JP Morgan Chase Bank, and Bank of America, that had branches in the Portland, Oregon area, in the Western District of Wisconsin, and in the other States where the marijuana was shipped.
- 6. It was further part of this conspiracy that LOC BUI, Peter Nguyen, Thay Kha Danh, Kyle D. Lux, and Stevenson Tran, directly and through others, known and unknown to the grand jury, deposited in total more than \$2,000,000 in cash marijuana proceeds into the bank accounts described in the preceding paragraph with these deposits occurring in the States to which the marijuana had been was shipped.

(All in violation of Title 21, United States Code, Section 846).

COUNT 2

- 1. Paragraphs 1 through 6 of Count 1 are incorporated here.
- 9. On or about October 23, 2014, in the Western District of Wisconsin and elsewhere, the defendant,

LOC BUI,

knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, knowingly conducted and attempted to conduct a financial transaction which affected interstate commerce, and which in fact involved the proceeds of a specified unlawful activity, namely, the unlawful distribution of marijuana, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), with the intent to conceal and disguise the nature, location, source, ownership, and control of the proceeds, specifically, LOC BUI caused a \$5,600 deposit into the "U.A.P." account at the University Avenue, Middleton, Wisconsin Wells Fargo Branch.

(In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Title 18, United States Code, Section 2).

9-12-2016

Date

SOHNWWAUDREUIL
United States Attorney